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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

CATALIN LAURENTIU BOTA,

Plaintiff,

v.

ALEJANDRO MAYORKAS, in his official
capacity as Secretary of Homeland Security,
U.S. DEPARTMENT OF HOMELAND
SECURITY, UR M. JADDOU, in her
official capacity as Acting Director of U.S.
Citizenship and Immigration Services, U.S.
CITIZENSHIP AND IMMIGRATION
SERVICES, the UNITED STATES OF
AMERICA and JOHN DOES I through
XX, inclusive,

Defendants.

Case No. 2:23-cv-01948-GMN-DJA

~~Stipulation and Order~~

(Second Request)

Plaintiff Catalin Laurentiu Bota and Defendants Alejandro Mayorkas, Secretary of
Homeland Security, US Department of Homeland Security, Ur M. Jaddou, Acting
Director of U.S. Citizenship and Immigration Services, United States Citizenship and
Immigration Services and United States of America ("Federal Defendants"), hereby
stipulate and agree as follows:

Plaintiff filed his Complaint on November 22, 2023.

Plaintiff served the United States with a copy of the Complaint via Certified Mail on
November 30, 2023.

1 The current deadline for the United States to respond to the Plaintiffs' Complaint is
2 on March 14, 2024.

3 Plaintiff and the Federal Defendants, through undersigned counsel, stipulate and
4 request that the Court approve a 90-day extension of time, from March 14, 2024, to June
5 12, 2024, for Federal Defendants to file a response to the Complaint, ECF No. 1. This is
6 the second request for an extension of time.

7 Defense counsel was informed by United States Citizenship and Immigration
8 Services that it is waiting on a response from Plaintiff to a Notice it issued on February 15,
9 2024. The extension is needed to allow time for plaintiff to submit his response, and for the
10 immigration officer to review the evidence and issue a decision.

11 Therefore, the parties request that the Court extend the deadline for the United States
12 to answer or otherwise respond to June 12, 2024.

13 This stipulated request is filed in good faith and not for the purposes of undue delay.

14 Respectfully submitted this 11th day of March, 2024.

15 REZA ATHARI, MILLS & FINK, PLLC

JASON M. FRIERSON
United States Attorney

17 /s/ Gary Fink
18 GARY FINK, ESQ.
19 Nevada Bar No. 8064
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21 Las Vegas, Nevada 89120
22 *Attorney for Plaintiffs*

/s/ Virginia T. Tomova
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23 **IT IS SO ORDERED:**

24 
25 DANIEL J. ALBREGTS
26 UNITED STATES MAGISTRATE JUDGE

27 DATED: March 12, 2024
28